Toffoloni v. LFP Publishing Group, LLC Doc. 7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI, as Administrator and Personal Representative of the ESTATE OF NANCY E. BENOIT, Plaintiff, vs. **LFP PUBLISHING GROUP, LLC,** d/b/a Hustler Magazine, et al, Defendant.	)))))))))))))	CASE NO. 1:08-cv-00421-TWT

DEFENDANT'S MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c) and for good cause shown, Defendant LFP Publishing Group, LLC ("LFP") respectfully submits this Motion for Protective Order preventing Plaintiff's First Interrogatories Nos. 7 through 9; Plaintiff's First Request for Production of Documents Nos. 2 through 7; and Plaintiff's Rule 30(b)(6) Notice of Deposition of LFP Topic Nos. 3, 4 and 8 through 11. In support of its Motion, LFP relies upon its Brief in Support of Defendant's Motion for Protective Order with accompanying exhibits, submitted contemporaneously herewith.

Dockets.Justia.com

WHEREFORE, LFP respectfully requests that this Court enter a protective order prohibiting Plaintiff's improper, burdensome, and unnecessary "punitive damages" discovery.

Respectfully submitted this 7th day of January 2010.

/s/ S. Derek Bauer
James C. Rawls
Georgia Bar No. 596050
Barry J. Armstrong
Georgia Bar No. 022055
S. Derek Bauer
Georgia Bar No. 042537
Darrell J. Solomon
Georgia Bar No. 305922

McKENNA LONG & ALDRIDGE LLP
303 Peachtree Street, NE, Suite 5300
Atlanta, Georgia 30308
(404) 527-4000
(404) 527-4198 (facsimile)

Pro hac vice:

Paul J. Cambria, Jr.
Jeffrey Reina
William M. Feigenbaum

LIPSITZ GREEN SCIME CAMBRIA LLP
42 Delaware Avenue, Suite 120
Buffalo, NY 14202-3924
(716) 849-1333
(716) 849-1315 (facsimile)

Attorneys for LFP Publishing Group, LLC

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FOR THE NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI, as Administrator and Personal Representative of the ESTATE OF NANCY E. BENOIT,	)	
Plaintiff,	)	CASE NO. 1:08-cv-00421-TWT
vs.	)	
LFP PUBLISHING GROUP, LLC, d/b/a Hustler Magazine, et al,	)	
Defendant.	)	

CERTIFICATE OF SERVICE

This is to certify that I have this day filed the within and foregoing MOTION FOR PROTECTIVE ORDER via the CM/ECF system which will automatically send notification to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 7th day of January 2010.

/s/ S. Derek Bauer
S. Derek Bauer
Georgia Bar No. 042537

MCKENNA LONG & ALDRIDGE LLP
303 Peachtree Street, Suite 5300
Atlanta, Georgia 30308
(404) 527-4000
(404) 527-4198 (facsimile)

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